

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

NATIONAL COUNCIL OF EXAMINERS)	
FOR ENGINEERING AND SURVEYING,)	
)	
)	
Plaintiff,)	
)	
v.)	Civil No. 07-1479 (SEC)
)	
BETHZAYDA CAMERON-ORTIZ)	
)	
Defendant.)	
)	

PLAINTIFF'S MOTION FOR LEAVE TO TAKE DISCOVERY

In a filing made concurrently with this motion, Plaintiff National Council of Examiners for Engineering and Surveying ("NCEES") has asked the Clerk to enter a default against Defendant Bethzaida Cameron-Ortiz in light of her failure to answer or otherwise respond to NCEES' complaint. In connection with that default, NCEES hereby moves the Court for leave to take certain limited discovery relating to the damages and other relief appropriately awarded to NCEES on its claims. The reasons for this motion are set forth more fully in the attached Memorandum of Points and Authorities.

WHEREFORE, Plaintiff NCEES respectfully requests that the Court grant its motion and permit Plaintiff to take discovery. NCEES will act expeditiously in taking the requested discovery.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico this 5th day of December, 2007.

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